

**WILLKIE FARR & GALLAGHER LLP**  
BENEDICT Y. HUR (SBN: 224018)  
bhur@willkie.com  
SIMONA AGNOLUCCI (SBN: 246943)  
sagnolucci@willkie.com  
EDUARDO E. SANTACANA (SBN: 281668)  
esantacana@willkie.com  
ARGEMIRA FLÓREZ (SBN: 331153)  
aflorez@willkie.com  
HARRIS A. MATEEN (SBN: 335593)  
hmateen@willkie.com  
RODOLFO E. RIVERA AQUINO (SBN: 348512)  
rriveraaquino@willkie.com  
333 Bush Street, 34<sup>th</sup> Floor  
San Francisco, CA 94104  
Telephone: (415) 858-7400

Attorneys for Defendant  
GOOGLE LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, et al. individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO APPROVE  
REVISED NOTICE TO WORKSPACE  
ADMINISTRATORS**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>th</sup> Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively referred to as the “Parties,” hereby enter into this joint stipulation.

WHEREAS, on January 3, 2024, the Court granted Plaintiffs’ Motion for Class Certification (Dkt. 352);

WHEREAS, on May 31, 2024, the Court granted Plaintiffs’ modified proposal for the notice program and also approved Google’s additional and revised notices (Dkt. 405);

WHEREAS, one of the approved items was a notice to Workspace administrators to apprise them of the fact that their end users would be receiving class notice (Dkt. 401-2);

WHEREAS, subsequent to the Court’s approval, Google identified the need for revisions to the notice to Workspace administrators;

WHEREAS, Google proposed revisions to the notice, and Plaintiffs have agreed to such revisions;

WHEREAS, the Parties have reached agreement on the revised notice to Workspace administrators attached hereto as Exhibit A; and

WHEREAS, a redline reflecting the proposed changes to the notice to Workspace administrators is attached hereto as Exhibit B;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that the revised notice to Workspace administrators, attached hereto as Exhibit A, shall replace the previously approved notice (Dkt. 401-2). The proposed revisions are consistent with the Court’s May 31 Order and are designed to provide clear and accurate information to Workspace administrators.

Good cause exists for this modification to ensure that the most up-to-date and accurate information is provided to Workspace administrators as part of the notice program, in compliance with the Court’s May 31 Order and Rule 23 of the Federal Rules of Civil Procedure.

1 IT IS SO STIPULATED.

2  
3 DATED: August 27, 2024

4 By: /s/ Benedict Y. Hur  
5 Benedict Y. Hur

6 DATED: August 27, 2024

7 By: /s/ Marc C. Mao  
8 Mark C. Mao

**[PROPOSED] ORDER**

Having considered the Parties' Joint Stipulation to Approve Revised Notice to Workspace Administrators, and good cause appearing, the Court hereby ORDERS that the revised notice to Workspace administrators, attached to the Parties' stipulation as Exhibit A, is APPROVED and shall replace the previously approved notice (Dkt. 401-2).

IT IS SO ORDERED.

Dated: August \_\_, 2024

\_\_\_\_\_  
HON. RICHARD SEEBORG